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January 15, 2021

BY ECF

Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square, Room 2102
New York, New York 10007

**Re: *City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.*,
Case No. 19 Civ. 2645 (AJN) (KHP)**

Dear Judge Nathan:

We represent the City of Almaty, Kazakhstan and BTA Bank (the “Kazakh Entities”). We write to respectfully request that the Court accept for filing under seal Exhibit 7 to the Declaration of Matthew L. Schwartz in Support of Plaintiffs’ Motion for Default Judgment Against Ferrari Holdings LLC (“Ferrari”).

In accordance with the Court’s Individual Practices ¶ 4(B), the Kazakh Entities are filing the proposed sealed Exhibit 7 under seal on the Court’s ECF system. Exhibit 7 is a bank statement that Ferrari previously produced and marked as confidential under the Protective Order in this case.¹ Because Ferrari remains unrepresented by counsel and has deactivated the only e-mail address Ferrari’s prior counsel provided, counsel for Plaintiffs have not met and conferred with Ferrari beforehand concerning whether Ferrari intends to maintain the document under seal. As such, we are now requesting Exhibit 7 be filed under seal and will be serving the motion papers on Ferrari along with this letter motion.

Thank you for your consideration of this request.

Respectfully,

/s/ Matthew L. Schwartz
Matthew L. Schwartz

¹ While Ferrari also designated Exhibit 2 to the Schwartz Declaration as confidential, that document was previously filed publicly with Ferrari’s consent. [See ECF No. 124-1.].